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U.S. Environmental Protection Agency

Re
26 Federal Plaza
New York, New York 10278

MAR 11 1986

Kerten

Shickler
Chojnowski
Janet

MAR 11 1986

Honorable James H. Scheuer
Chairman, Subcommittee on Natural
Resources, Agriculture, & Environment
Committee on Science and Technology
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Scheuer:

Thank you for the opportunity to appear before the Subcommittee on January 27, 1986 to discuss the status of the Superfund program in Region 2. The following information concerning Quanta Resources, Inc. and Scientific Chemical Processing, Carlstadt, is being submitted for inclusion in the record in response to questions raised by Mr. Torricelli during the hearing.

Quanta Resources

A copy of the Administrative Consent Order signed by Allied Chemical with EPA on September 30, 1985 is enclosed for your information. Under the terms of this order, Allied will perform a removal action consisting of sampling, removing, and disposing of all wastes from all tanks, repair and upgrading of spill containment walls, maintenance of the oil/water separator, and air quality monitoring. Allied will also pay for all costs incurred by the U.S. Government in connection with the facility after June 14, 1985.

A group of approximately 140 generators and transporters who sent wastes to the site did not sign the consent order but did contribute more than \$5 million to a trust fund which will be used by Allied to fund a portion of the removal action. A copy of the agreement governing this arrangement is also enclosed. Allied will contribute any additional funds that are required to complete the removal work.

Allied actually began work at the site in mid-November, 1985 and the action is scheduled to be completed in or before March, 1988.

A unilateral order, requiring sampling of soil, Hudson River sediments, oily waste from the River surface, repair and maintenance of the fire protection system, and removal of two tanks and visibly contaminated soil, was issued on October 16, 1985 to forty-seven potentially responsible parties who did not contribute to the trust fund.

These parties missed the first deadlines for selection of a coordinator and submission of a workplan set forth in the order and are essentially out of compliance with it. We have been contacted by one of the larger companies involved in the unilateral order for information on the other parties so that they might be contacted; however, we have not been approached by any other members or by the group as a whole. It is possible that the parties may be trying to reach an agreement among themselves before contacting EPA formally.

However, we intend to seek recovery of costs for work already performed at the site by EPA and to seek civil penalties for violations of the order. We will be working closely with the Department of Justice.

I would also like to clarify a response that was given at the hearing concerning the percentage of wastes from Quanta that will be destroyed or treated rather than just removed to another site for containment.

From April through October, 1985, EPA removed or treated in excess of 7 million gallons of material, including four million gallons of contaminated rainwater which were treated on site to meet National Pollution Discharge Elimination System (NPDES) standards and discharged into the Hudson River.

Approximately 2.8 million of 5 million gallons of materials were removed from above ground tanks on the site. The 2.8 million gallons consisted of 2.7 million gallons of aqueous materials which were treated both on and off site to meet appropriate standards. Seventy-five thousand of the 2.8 million gallons consisted of contaminated oils which were treated offsite and then recycled as fuel. The remaining 30,000 gallons of tank bottom sludges were solidified and sent to a landfill.

Approximately 2.2 million gallons of hazardous materials remain in the above ground tanks on site; 1.2 million gallons are scheduled for recycling into usable products. Of the remaining 1 million gallons, we estimate that about 75 percent can be either treated or recycled. The other 25 percent, which consists of contaminated soils and tank bottoms, will be solidified and sent to a landfill.

Scientific Chemical Processing (SCP), Carlstadt

I am pleased to report that Inmar Associates submitted a workplan for the remaining surface cleanup activity at this site on Tuesday, January 28, 1986. Our comments on the workplan were sent to Inmar on January 30. On February 5, 1986, Inmar Associates began sampling activities related to removal of the PCB waste on site. The removal action will begin when analytical results of the samples taken from the 5 tanks on the site which contain PCB waste are received. They are expected in two weeks. Such analysis is necessary to determine the proper method for

The surface cleanup is expected to take two months to complete after the results are received and will be overseen by EPA's Technical Assistance Team (TAT) contractor. Work on the Remedial Investigation/Feasibility Study (RI/FS) by the group of potentially responsible parties can begin thereafter and the report should be available for public review and comment by January, 1987.

Copies of the three orders concerning SCP Carlstadt, are enclosed for your information.

Please feel free to contact me or have your staff contact Alice Jackson Jenik of my office at (212) 264-4530 if you have any questions or need additional information.

Sincerely,

/s/ Christopher J. Daggett

Christopher J. Daggett
Regional Administrator

Enclosures (6)

cc: Honorable Robert G. Torricelli
Commissioner Richard Dewling, NJDEP

bcc: Bill Librizzi
John Witkowski
~~Del Marlen~~
Craig DeRamer, OCL